

EXHIBIT B

I. Micron's Proposed Constructions and Identification of Supporting Evidence for Disputed Claim Terms¹²**A. U.S. Patent Nos. 8,787,060 and 9,318,160**

Proposed Terms³	Proposed Constructions	Intrinsic Evidence	Extrinsic Evidence
<p>“the second driver size being different from the first driver size”</p> <p>(’160 patent, all asserted claims)</p>	<p>“the physical dimensions of the second driver being different from the physical dimensions of the first driver”</p>	<ul style="list-style-type: none"> U.S. Patent No. 9,318,160 at FIGS. 1-3, 2:8-15, 13:13-26, 17:14-49, claims 1, 2, 4 <p>Micron reserves the right to rely on intrinsic evidence cited by Netlist.</p>	<p>Dictionary of Computing, A&C Black, Sixth Edition, at 113 (2010)</p> <p>Wiley Electrical and Electronics Engineering Dictionary, IEEE Press, at 213 (2004)</p> <p>Declaration of Dr. Stone explaining the technology, state of the art at the time the applications leading to the ’060 and ’160 patents were filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention.</p>
<p>“The memory package of claim 1, wherein a first number of array</p>	<p>Indefinite</p>	<ul style="list-style-type: none"> U.S. Patent No. 8,787,060 at claims 1 and 7 	

¹ While the papers, prosecution histories, and *Inter Partes* Review proceedings cited below are intrinsic records, Micron nevertheless identifies them in its Patent Rule 4-3 Disclosures out of an abundance of caution.

² In its Patent Rule 4-2 Disclosures, Netlist did not identify any extrinsic evidence. Therefore, pursuant to this Court’s Patent Rules, Netlist is precluded from relying upon any extrinsic evidence. To the extent, however, Netlist provide untimely disclosure of extrinsic evidence, Micron reserves the right to rely on such extrinsic evidence and to provide rebuttal expert opinion.

³ Listed claims also include all claims dependent thereon, even if those claims are not separately listed.

Proposed Terms ³	Proposed Constructions	Intrinsic Evidence	Extrinsic Evidence
<p>dies in the first group of array dies and a second number of at least one array die in the second group of at least one array die are selected in consideration of a load of the first die interconnect and a load of the second die interconnect so as to reduce a difference between a first load on the first data conduit and a second load on the second data conduit, the first load including a load of the first die interconnect, and a load of the first group of array dies, and the second load including a load of the second die interconnect and a load of the second</p>		<p>Micron reserves the right to rely on intrinsic evidence cited by Netlist.</p>	

Proposed Terms ³	Proposed Constructions	Intrinsic Evidence	Extrinsic Evidence
<p>group of at least one array die.”</p> <p>(’060 patent, claim 7)</p>			
<p>“die interconnect[s] in electrical communication with ... the group of array dies and not in electrical communication with the ... group of at least one array die” (’060 patent, claims 1, 11, 20, 29; ’160 patent, claim 1)</p>	<p>Plain and ordinary meaning, <i>i.e.</i>, does not require importing “data ports” limitation into the claim to require electrical communications (or lack of electrical communications) between the die interconnect(s) and the <i>data ports</i> of the array die(s).</p>	<ul style="list-style-type: none"> U.S. Patent No. 8,787,060 at FIGS. 1-3, Abstract, 2:19-60, 4:22-54, 4:55-5:40, 5:46-6:35, 6:60-7:21, 7:30-62, 8:35-62, 8:63-9:16, 9:46-60, 10:41-55, 13:19-26, 14:4-39, 14:47-15:3, 15:39-67, 16:1-20, 16:29-41, 17:4-36, claims 1, 11, 15, 20, 29 Corresponding sections of the specification and figures from U.S. Patent No. 9,318,160 <p>Micron reserves the right to rely on intrinsic evidence cited by Netlist.</p>	

B. U.S. Patent No. 10,860,506

Proposed Terms ⁴	Proposed Constructions	Intrinsic Evidence	Preliminary Extrinsic Evidence
<p>“one or more previous operations” (Claims 1–3, 11, 15, 16)</p>	<p>“one or more previous memory operations” where “memory operations” are different from leveling operations</p> <p>NOTE: Micron is making this argument only to the extent that Netlist is successful in IPR2022-00236 or IPR2023-00205 where Netlist argued that leveling is not a memory operation.</p>	<ul style="list-style-type: none"> U.S. Patent No. 10,860,506 at Abstract; Figs. 1-19; 2:28-36, 3:4-6, 3:25-50, 4:9-19, 4:65-5:10, 5:11-26, 5:43-57, 5:58-6:3, 7:44-8:8, 8:22-55, 8:56-9:26, 10:7-21, 15:17-26, 15:27-50, 15:51-65, 15:66-16:9, 16:10-24, 16:25-18:5, 18:6-28, 18:29-40, 18:41-48, 18:49-64; claims 1-20 U.S. Patent No. 10,860,506 File History, 2019-04-22 Application, 2020-01-10 Non-Final Rejection, 2020-04-10 Amendment and Request for Reconsideration After Non-Final Rejection, 2020-07-23 Notice of Allowance, 2020-10-16 Amendment After Notice of Allowance IPR2022-00711, Paper 7 (POPR) at 8-9, 73-76 U.S. Patent No. 8,001,434 at Figs. 3-6, 1:27-35, 1:36-57, 6:58-7:20, 9:34-53, 9:54-10:26, 13:30-56, 13:57-14:9; claims 1-35 U.S. Patent No. 8,756,364 at Figs. 1-5, 12; Table 1, Table 2; 2:44-51, 	<ul style="list-style-type: none"> IPR2017-00730, Paper 6 (POPR) at 10–13, 21–22, 28 IPR2022-00236, Paper 12 (POPR) at 4, 7, 13–24 IPR2022-00236, Paper 16 (Institution Decision) at 24 IPR2022-00236, Paper 21 (PO Response) at 1–2, 13–29, 54–59. IPR2022-00236, Paper 27 (PO Sur-Reply) at 1–5 IPR2022-00237, Paper 12 (POPR) at 6–8 IPR2022-00711, Paper 7 (POPR) at 16–22, 30–56, 59–76, 78–82 IPR2022-00711, Paper 23 (PO Resp.) at 1–2, 3–10, 13–40, 44–73, 76–86 U.S. Patent No. 9,128,632, File History, 2014-12-31 Amendment and Request for Reconsideration After Non-Final Rejection at 10 U.S. Patent No. 9,824,035, File History, 2017-09-21 Notice of Allowance at 3

⁴ Listed claims also include all claims dependent thereon, even if those claims are not separately listed.

Proposed Terms ⁴	Proposed Constructions	Intrinsic Evidence	Preliminary Extrinsic Evidence
		<p>7:1-9:18, 25:30-26:12, 29:15-28; claims 1-32</p> <ul style="list-style-type: none"> U.S. Patent No. 8,516,188 at Figs. 1-14; Table 1, Table 2; 2:51-59, 7:37-59, 14:61-15:7, 16:46-18:63, 34:5-20, 37:33-46; claims 1-20 	<ul style="list-style-type: none"> U.S. Patent No. 10,268,608, File History, 2018-01-25 Office Action at 11 U.S. Patent No. 10,268,608, File History, 2018-05-24 Amendment and Request for Reconsideration After Non-Final Rejection at 3 U.S. Patent No. 10,268,608, File History, 2018-11-19 Notice of Allowance at 3
<p>“before receiving the input C/A signals corresponding to the memory read operation, determining the first predetermined amount based at least on signals received by the first data buffer” (Claim 14)</p>	<p>“during one or more previous memory operations, determining the first predetermined amount based at least on signals received by the first data buffer” where “memory operations” are different from leveling operations</p> <p>NOTE: Micron is making this argument only to the extent that Netlist is successful in IPR2022-00236 or IPR2023-00205 where Netlist argued that leveling is not a memory operation.</p>	<ul style="list-style-type: none"> U.S. Patent No. 10,860,506 at Abstract; Figs. 1-19; 2:28-36, 3:4-6, 3:25-50, 4:9-19, 4:65-5:10, 5:11-26, 5:43-57, 5:58-6:3, 7:44-8:8, 8:22-55, 8:56-9:26, 10:7-21, 15:17-26, 15:27-50, 15:51-65, 15:66-16:9, 16:10-24, 16:25-18:5, 18:6-28, 18:29-40, 18:41-48, 18:49-64; claims 1-20 U.S. Patent No. 10,860,506 File History, 2019-04-22 Application, 2020-01-10 Non-Final Rejection, 2020-04-10 Amendment and Request for Reconsideration After Non-Final Rejection, 2020-07-23 Notice of Allowance, 2020-10-16 Amendment After Notice of Allowance 	<ul style="list-style-type: none"> IPR2017-00730, Paper 6 (POPR) at 10–13, 21–22, 28 IPR2022-00236, Paper 12 (POPR) at 4, 7, 13–24 IPR2022-00236, Paper 16 (Institution Decision) at 24 IPR2022-00236, Paper 21 (PO Response) at 1–2, 13–29, 54–59. IPR2022-00236, Paper 27 (PO Sur-Reply) at 1–5 IPR2022-00237, Paper 12 (POPR) at 6–8 IPR2022-00711, Paper 7 (POPR) at 16–22, 30–56, 59–76, 78–82 IPR2022-00711, Paper 23 (PO Resp.) at 1–2, 3–10, 13–40, 44–73, 76–86 U.S. Patent No. 9,128,632, File History, 2014-12-31 Amendment

Proposed Terms ⁴	Proposed Constructions	Intrinsic Evidence	Preliminary Extrinsic Evidence
		<ul style="list-style-type: none"> • IPR2022-00711, Paper 7 (POPR) at 8-9, 73-76 • U.S. Patent No. 8,001,434 at Figs. 3-6, 1:27-35, 1:36-57, 6:58-7:20, 9:34-53, 9:54-10:26, 13:30-56, 13:57-14:9; claims 1-35 • U.S. Patent No. 8,756,364 at Figs. 1-5, 12; Table 1, Table 2; 2:44-51, 7:1-9:18, 25:30-26:12, 29:15-28; claims 1-32 • U.S. Patent No. 8,516,188 at Figs. 1-14; Table 1, Table 2; 2:51-59, 7:37-59, 14:61-15:7, 16:46-18:63, 34:5-20, 37:33-46; claims 1-20 	<p>and Request for Reconsideration After Non-Final Rejection at 10</p> <ul style="list-style-type: none"> • U.S. Patent No. 9,824,035, File History, 2017-09-21 Notice of Allowance at 3 • U.S. Patent No. 10,268,608, File History, 2018-01-25 Office Action at 11 • U.S. Patent No. 10,268,608, File History, 2018-05-24 Amendment and Request for Reconsideration After Non-Final Rejection at 3 • U.S. Patent No. 10,268,608, File History, 2018-11-19 Notice of Allowance at 3

C. U.S. Patent No. 10,949,339

Proposed Terms ⁵	Proposed Construction	Intrinsic Evidence	Preliminary Extrinsic Evidence
“to actively drive a respective byte-wise section of the N-bit wide write data” (claim 1)	Adopts and applies the Court’s adoption of the “fork-in-the-road” configuration and rejection of the “straight-line” configuration to construe “drive” to mean “enabling only one of the data paths	<ul style="list-style-type: none"> • U.S. Patent No. 10,949,339 at Abstract; Figs. 1-6; 1:18-51, 1:52-2:4, 2:5-23, 2:26-61, 2:62-3:22, 3:23-28, 3:51-4:8, 4:15-47, 4:48-5:3, 5:4-22, 5:23-43, 5:44-64, 5:65-6:16, 6:17-41, 6:42-64, 6:65-7:14, 7:15-43, 7:44-8:53, 9:27-43, 10:54-11:44, 11:45-12:14, 13:31- 	<ul style="list-style-type: none"> • U.S. Patent No. 8,516,185, File History, 2012-06-21 Amendment and Request for Reconsideration after Non-Final Rejection at 7–9 • U.S. Patent No. 8,516,185, File History, 2012-09-13 Office Action at 4–5, 11–13

⁵ Listed claims also include all claims dependent thereon, even if those claims are not separately listed.

Proposed Terms ⁵	Proposed Construction	Intrinsic Evidence	Preliminary Extrinsic Evidence
	<p>while the other possible paths are disabled,” <i>i.e.</i>,</p> <p>“enable only one of the data paths for the respective byte-wise section of the N-bit wide write data while the other possible data paths for the same respective byte-wise section of the N-bit wide write data are disabled”</p>	<p>53, 13:54-14:14, 14:15-33, 14:34-58, 14:59-15:25, 15:26-40, 15:41-60, 15:61-16:6, 16:7-25, 16:26-44, 16:45-64, 16:65-17:14, 17:15-44, 17:44-18:24, 18:25-65; claims 1-35</p> <ul style="list-style-type: none"> U.S. Patent No. 10,949,339 File History, 2017-03-27 Application, 2017-10-06 Non-Final Rejection, 2018-04-06 Amendment and Request for Reconsideration After Non-Final Rejection, 2018-07-27 Final Rejection, 2019-07-29 Amendment and Request for Continued Examination, 2019-10-03 Non-Final Rejection, 2020-03-25 Amendment and Request for Reconsideration After Non-Final Rejection, 2020-04-24 Final Rejection, 2020-06-24 Response After Final Action, 2020-07-14 After Final Consideration Program Decision, 2020-07-24 Amendment and Request for Continued Examination, 2020-07-29 Examiner Interview Summary Record, 2020-11-16 Notice of Allowance, 2020-12-17 Amendment After Notice of Allowance, 2021-01-21 Notice of 	<ul style="list-style-type: none"> U.S. Patent No. 8,516,185, File History, 2013-03-13 Amendment and Request for Reconsideration after Non-Final Rejection at 10–13 U.S. Patent No. 8,516,185, File History, 2013-07-11 Notice of Allowance at 2–4 U.S. Patent No. 8,417,870, File History, 2013-02-02 Notice of Allowance at 7–9 U.S. Patent No. 9,606,907, File History, 2015-11-23 Office Action at 5–6 U.S. Patent No. 9,606,907, File History, 2016-10-06 Office Action at 2–5, 7 U.S. Patent No. 9,606,907, File History, 2016-11-03 Amendment at 29–34 U.S. Patent No. 9,606,907, File History, 2017-02-23 Corrected Notice of Allowability at 2–3 IPR2014-01029, Paper 10 (POPR) at 4–6 IPR2014-01029, Paper 11 (Institution Decision) at 2–3

Proposed Terms ⁵	Proposed Construction	Intrinsic Evidence	Preliminary Extrinsic Evidence
		<p>Allowance and Response to Amendment</p> <ul style="list-style-type: none"> • U.S. Patent No. 9,606,907 at 2:25-3:20; claims 1-65 • U.S. Patent No. 8,417,870 at Abstract; Figs. 1-5; 1:50-57, 2:19-3:8, 3:17-4:44, 4:58-64, 5:25-59, 6:39-7:19, 7:20-8:36, 8:37-9:4, 9:5-37, 9:38-57; claims 1-20 • U.S. Patent No. 7,289,386 at Abstract; Figs. 1-7; 3:17-30, 23:24-34, 24:57-26:19, 27:21-28:17, 30:47-32:50; claims 1-13 • U.S. Patent No. 7,532,537 at Abstract; Figs. 3A-11; 2:62-3:35, 4:55-5:2, 5:59-9:18, 13:4-14:36, 17:8-18:50, 33:51-61, 35:4-65, 38:25-40:26, claims 1-44 <p>Micron reserves the right to rely on intrinsic evidence cited by Netlist.</p>	<ul style="list-style-type: none"> • IPR2014-01369, Paper 11 (POPR) at 5–6, 19, 35–41 • IPR2014-01369, Paper 12 (Institution Decision) at 2–4, 6–8 • IPR2017-00577, Paper 6 (POPR) at 2–6, 9–11, 13–17, 18–47, 50–65 • IPR2017-00577, Paper 8 (Institution Decision) at 3–4, 9–10 • IPR2017-00577, Paper 26 (Final Written Decision) at 3–4, 14–16 • <i>Netlist, Inc. v. Smart Modular Techs., Inc.</i>, No. 4:13-cv-05889-YGR, Dkt. No. 253 at 11–12, 15–16 (N.D. Cal. Aug. 27, 2014) • <i>Netlist, Inc. v. SK Hynix Inc. et al.</i>, No. 8:16-cv-01605-JLS-JCG, Dkt. No. 117, Exhibit A at 8–14, 20–40 (C.D. Cal. May 19, 2017) • <i>Netlist, Inc. v. SK Hynix Inc. et al.</i>, No. 8:16-cv-01605-JLS-JCG, Dkt. No. 124 at 6–11 (C.D. Cal. May 26, 2017) • <i>Netlist, Inc. v. SK Hynix Inc. et al.</i>, No. 8:16-cv-01605-JLS-JCG, Dkt. No. 143 at 2–9 (C.D. Cal. June 30, 2017)

Proposed Terms ⁵	Proposed Construction	Intrinsic Evidence	Preliminary Extrinsic Evidence
			<ul style="list-style-type: none"> • <i>In the Matter of Certain Memory Modules and Components Thereof, and Products Containing the Same</i>, Inv. No. 337-TA-1023, Nov. 14, 2017 Initial Determination at 116–121 (USITC filed Sept. 1, 2016) • <i>In the Matter of Certain Memory Modules and Components Thereof, and Products Containing the Same</i>, Inv. No. 337-TA-1023, Jan. 16, 2018 Commission Review at 1–2 (USITC filed Sept. 1, 2016) • <i>In the Matter of Certain Memory Modules and Components Thereof</i>, Inv. No. 337-TA-1089, Nov. 22, 2019 Complainant Netlist, Inc.’s Omnibus Response to Respondents’ and Staff’s Petitions for Review at 29–33 (USITC filed Oct. 31, 2017) • <i>In the Matter of Certain Memory Modules and Components Thereof</i>, Inv. No. 337-TA-1089, Apr. 21, 2020 Commission Opinion at 7–13 (USITC filed Oct. 31, 2017) • Collins English Dictionary, Seventh Edition, at 16 (2005)

Proposed Terms ⁵	Proposed Construction	Intrinsic Evidence	Preliminary Extrinsic Evidence
			<ul style="list-style-type: none"> • The New Oxford American Dictionary, Second Edition, at 15–16 (2005) • Newton's Telecom Dictionary, 24th Edition, at 180–81, 263 (2008) • McGraw-Hill Dictionary of Scientific and Technical Terms, Sixth Edition, at 294 (2003) • Dictionary of Computing, Fifth Edition, at 92, 94 (2004) • Wiley Electrical and Electronics Engineering Dictionary, at 212, 256 (2004) • A Dictionary of Computing, Fifth Edition, at 179 (2004)
<p>“to actively drive a respective section of the N-bit wide write data” (claim 11)</p>	<p>Adopts and applies the Court’s adoption of the “fork-in-the-road” configuration and rejection of the “straight-line” configuration to construe “drive” to mean “enabling only one of the data paths while the other possible paths are disabled,” <i>i.e.</i>,</p>	<ul style="list-style-type: none"> • U.S. Patent No. 10,949,339 at Abstract; Figs. 1-6; 1:18-51, 1:52-2:4, 2:5-23, 2:26-61, 2:62-3:22, 3:23-28, 3:51-4-8, 4:15-47, 4:48-5:3, 5:4-22, 5:23-43, 5:44-64, 5:65-6:16, 6:17-41, 6:42-64, 6:65-7:14, 7:15-43, 7:44-8:53, 9:27-43, 10:54-11:44, 11:45-12:14, 13:31-53, 13:54-14:14, 14:15-33, 14:34-58, 14:59-15:25, 15:26-40, 15:41-60, 15:61-16:6, 16:7-25, 16:26-44, 16:45-64, 16:65-17:14, 17:15-44, 	<ul style="list-style-type: none"> • U.S. Patent No. 8,516,185, File History, 2012-06-21 Amendment and Request for Reconsideration after Non-Final Rejection at 7–9 • U.S. Patent No. 8,516,185, File History, 2012-09-13 Office Action at 4–5, 11–13 • U.S. Patent No. 8,516,185, File History, 2013-03-13 Amendment

Proposed Terms ⁵	Proposed Construction	Intrinsic Evidence	Preliminary Extrinsic Evidence
	<p>“enabling only one of the data paths for the respective section of the N-bit wide write data while the other possible data paths for the same respective section of the N-bit wide write data are disabled”</p>	<p>17:44-18:24, 18:25-65; claims 1-35</p> <ul style="list-style-type: none"> U.S. Patent No. 10,949,339 File History, 2017-03-27 Application, 2017-10-06 Non-Final Rejection, 2018-04-06 Amendment and Request for Reconsideration After Non-Final Rejection, 2018-07-27 Final Rejection, 2019-07-29 Amendment and Request for Continued Examination, 2019-10-03 Non-Final Rejection, 2020-03-25 Amendment and Request for Reconsideration After Non-Final Rejection, 2020-04-24 Final Rejection, 2020-06-24 Response After Final Action, 2020-07-14 After Final Consideration Program Decision, 2020-07-24 Amendment and Request for Continued Examination, 2020-07-29 Examiner Interview Summary Record, 2020-11-16 Notice of Allowance, 2020-12-17 Amendment After Notice of Allowance, 2021-01-21 Notice of Allowance and Response to Amendment U.S. Patent No. 9,606,907 at 2:25-3:20; claims 1-65 	<p>and Request for Reconsideration after Non-Final Rejection at 10–13</p> <ul style="list-style-type: none"> U.S. Patent No. 8,516,185, File History, 2013-07-11 Notice of Allowance at 2–4 U.S. Patent No. 8,417,870, File History, 2013-02-02 Notice of Allowance at 7–9 U.S. Patent No. 9,606,907, File History, 2015-11-23 Office Action at 5–6 U.S. Patent No. 9,606,907, File History, 2016-10-06 Office Action at 2–5, 7 U.S. Patent No. 9,606,907, File History, 2016-11-03 Amendment at 29–34 U.S. Patent No. 9,606,907, File History, 2017-02-23 Corrected Notice of Allowability at 2–3 IPR2014-01029, Paper 10 (POPR) at 4–6 IPR2014-01029, Paper 11 (Institution Decision) at 2–3 IPR2014-01369, Paper 11 (POPR) at 5–6, 19, 35–41

Proposed Terms ⁵	Proposed Construction	Intrinsic Evidence	Preliminary Extrinsic Evidence
		<ul style="list-style-type: none"> U.S. Patent No. 8,417,870 at Abstract; Figs. 1-5; 1:50-57, 2:19-3:8, 3:17-4:44, 4:58-64, 5:25-59, 6:39-7:19, 7:20-8:36, 8:37-9:4, 9:5-37, 9:38-57; claims 1-20 U.S. Patent No. 7,289,386 at Abstract; Figs. 1-7; 3:17-30, 23:24-34, 24:57-26:19, 27:21-28:17, 30:47-32:50; claims 1-13 U.S. Patent No. 7,532,537 at Abstract; Figs. 3A-11; 2:62-3:35, 4:55-5:2, 5:59-9:18, 13:4-14:36, 17:8-18:50, 33:51-61, 35:4-65, 38:25-40:26, claims 1-44 <p>Micron reserves the right to rely on intrinsic evidence cited by Netlist.</p>	<ul style="list-style-type: none"> IPR2014-01369, Paper 12 (Institution Decision) at 2–4, 6–8 IPR2017-00577, Paper 6 (POPR) at 2–6, 9–11, 13–17, 18–47, 50–65 IPR2017-00577, Paper 8 (Institution Decision) at 3–4, 9–10 IPR2017-00577, Paper 26 (Final Written Decision) at 3–4, 14–16 <i>Netlist, Inc. v. Smart Modular Techs., Inc.</i>, No. 4:13-cv-05889-YGR, Dkt. No. 253 at 11–12, 15–16 (N.D. Cal. Aug. 27, 2014) <i>Netlist, Inc. v. SK Hynix Inc. et al.</i>, No. 8:16-cv-01605-JLS-JCG, Dkt. No. 117, Exhibit A at 8–14, 20–40 (C.D. Cal. May 19, 2017) <i>Netlist, Inc. v. SK Hynix Inc. et al.</i>, No. 8:16-cv-01605-JLS-JCG, Dkt. No. 124 at 6–11 (C.D. Cal. May 26, 2017) <i>Netlist, Inc. v. SK Hynix Inc. et al.</i>, No. 8:16-cv-01605-JLS-JCG, Dkt. No. 143 at 2–9 (C.D. Cal. June 30, 2017) <i>In the Matter of Certain Memory Modules and Components Thereof, and Products Containing the</i>

Proposed Terms ⁵	Proposed Construction	Intrinsic Evidence	Preliminary Extrinsic Evidence
			<p><i>Same</i>, Inv. No. 337-TA-1023, Nov. 14, 2017 Initial Determination at 116–121 (USITC filed Sept. 1, 2016)</p> <ul style="list-style-type: none"> • <i>In the Matter of Certain Memory Modules and Components Thereof, and Products Containing the Same</i>, Inv. No. 337-TA-1023, Jan. 16, 2018 Commission Review at 1–2 (USITC filed Sept. 1, 2016) • <i>In the Matter of Certain Memory Modules and Components Thereof</i>, Inv. No. 337-TA-1089, Nov. 22, 2019 Complainant Netlist, Inc.’s Omnibus Response to Respondents’ and Staff’s Petitions for Review at 29–33 (USITC filed Oct. 31, 2017) • <i>In the Matter of Certain Memory Modules and Components Thereof</i>, Inv. No. 337-TA-1089, Apr. 21, 2020 Commission Opinion at 7–13 (USITC filed Oct. 31, 2017) • Collins English Dictionary, Seventh Edition, at 16 (2005) • The New Oxford American Dictionary, Second Edition, at 15–16 (2005)

Proposed Terms ⁵	Proposed Construction	Intrinsic Evidence	Preliminary Extrinsic Evidence
			<ul style="list-style-type: none"> • Newton's Telecom Dictionary, 24th Edition, at 180–81, 263 (2008) • McGraw-Hill Dictionary of Scientific and Technical Terms, Sixth Edition, at 294 (2003) • Dictionary of Computing, Fifth Edition, at 92, 94 (2004) • Wiley Electrical and Electronics Engineering Dictionary, at 212, 256 (2004) • A Dictionary of Computing, Fifth Edition, at 179 (2004)
<p>“actively drive a respective section of the [first/second] N-bit wide data” (claim 19)</p>	<p>Adopts and applies the Court’s adoption of the “fork-in-the-road” configuration and rejection of the “straight-line” configuration to construe “drive” to mean “enabling only one of the data paths while the other possible paths are disabled,” <i>i.e.</i>,</p> <p>“enable only one of the data paths of a respective section for the [first/second] N-bit wide</p>	<ul style="list-style-type: none"> • U.S. Patent No. 10,949,339 at Abstract; Figs. 1-6; 1:18-51, 1:52-2:4, 2:5-23, 2:26-61, 2:62-3:22, 3:23-28, 3:51-4-8, 4:15-47, 4:48-5:3, 5:4-22, 5:23-43, 5:44-64, 5:65-6:16, 6:17-41, 6:42-64, 6:65-7:14, 7:15-43, 7:44-8:53, 9:27-43, 10:54-11:44, 11:45-12:14, 13:31-53, 13:54-14:14, 14:15-33, 14:34-58, 14:59-15:25, 15:26-40, 15:41-60, 15:61-16:6, 16:7-25, 16:26-44, 16:45-64, 16:65-17:14, 17:15-44, 17:44-18:24, 18:25-65; claims 1-35 	<ul style="list-style-type: none"> • U.S. Patent No. 8,516,185, File History, 2012-06-21 Amendment and Request for Reconsideration after Non-Final Rejection at 7–9 • U.S. Patent No. 8,516,185, File History, 2012-09-13 Office Action at 4–5, 11–13 • U.S. Patent No. 8,516,185, File History, 2013-03-13 Amendment and Request for Reconsideration after Non-Final Rejection at 10–13

Proposed Terms ⁵	Proposed Construction	Intrinsic Evidence	Preliminary Extrinsic Evidence
	data while the other possible data paths for the same respective section for the [first/second] N-bit wide data are disabled”	<ul style="list-style-type: none"> U.S. Patent No. 10,949,339 File History, 2017-03-27 Application, 2017-10-06 Non-Final Rejection, 2018-04-06 Amendment and Request for Reconsideration After Non-Final Rejection, 2018-07-27 Final Rejection, 2019-07-29 Amendment and Request for Continued Examination, 2019-10-03 Non-Final Rejection, 2020-03-25 Amendment and Request for Reconsideration After Non-Final Rejection, 2020-04-24 Final Rejection, 2020-06-24 Response After Final Action, 2020-07-14 After Final Consideration Program Decision, 2020-07-24 Amendment and Request for Continued Examination, 2020-07-29 Examiner Interview Summary Record, 2020-11-16 Notice of Allowance, 2020-12-17 Amendment After Notice of Allowance, 2021-01-21 Notice of Allowance and Response to Amendment U.S. Patent No. 9,606,907 at 2:25-3:20; claims 1-65 U.S. Patent No. 8,417,870 at Abstract; Figs. 1-5; 1:50-57, 2:19-3:8, 3:17-4:44, 4:58-64, 5:25-59, 	<ul style="list-style-type: none"> U.S. Patent No. 8,516,185, File History, 2013-07-11 Notice of Allowance at 2–4 U.S. Patent No. 8,417,870, File History, 2013-02-02 Notice of Allowance at 7–9 U.S. Patent No. 9,606,907, File History, 2015-11-23 Office Action at 5–6 U.S. Patent No. 9,606,907, File History, 2016-10-06 Office Action at 2–5, 7 U.S. Patent No. 9,606,907, File History, 2016-11-03 Amendment at 29–34 U.S. Patent No. 9,606,907, File History, 2017-02-23 Corrected Notice of Allowability at 2–3 IPR2014-01029, Paper 10 (POPR) at 4–6 IPR2014-01029, Paper 11 (Institution Decision) at 2–3 IPR2014-01369, Paper 11 (POPR) at 5–6, 19, 35–41 IPR2014-01369, Paper 12 (Institution Decision) at 2–4, 6–8

Proposed Terms ⁵	Proposed Construction	Intrinsic Evidence	Preliminary Extrinsic Evidence
		<p>6:39-7:19, 7:20-8:36, 8:37-9:4, 9:5-37, 9:38-57; claims 1-20</p> <ul style="list-style-type: none"> • U.S. Patent No. 7,289,386 at Abstract; Figs. 1-7; 3:17-30, 23:24-34, 24:57-26:19, 27:21-28:17, 30:47-32:50; claims 1-13 • U.S. Patent No. 7,532,537 at Abstract; Figs. 3A-11; 2:62-3:35, 4:55-5:2, 5:59-9:18, 13:4-14:36, 17:8-18:50, 33:51-61, 35:4-65, 38:25-40:26, claims 1-44 <p>Micron reserves the right to rely on intrinsic evidence cited by Netlist.</p>	<ul style="list-style-type: none"> • IPR2017-00577, Paper 6 (POPR) at 2–6, 9–11, 13–17, 18–47, 50–65 • IPR2017-00577, Paper 8 (Institution Decision) at 3–4, 9–10 • IPR2017-00577, Paper 26 (Final Written Decision) at 3–4, 14–16 • <i>Netlist, Inc. v. Smart Modular Techs., Inc.</i>, No. 4:13-cv-05889-YGR, Dkt. No. 253 at 11–12, 15–16 (N.D. Cal. Aug. 27, 2014) • <i>Netlist, Inc. v. SK Hynix Inc. et al.</i>, No. 8:16-cv-01605-JLS-JCG, Dkt. No. 117, Exhibit A at 8–14, 20–40 (C.D. Cal. May 19, 2017) • <i>Netlist, Inc. v. SK Hynix Inc. et al.</i>, No. 8:16-cv-01605-JLS-JCG, Dkt. No. 124 at 6–11 (C.D. Cal. May 26, 2017) • <i>Netlist, Inc. v. SK Hynix Inc. et al.</i>, No. 8:16-cv-01605-JLS-JCG, Dkt. No. 143 at 2–9 (C.D. Cal. June 30, 2017) • <i>In the Matter of Certain Memory Modules and Components Thereof, and Products Containing the Same</i>, Inv. No. 337-TA-1023, Nov. 14, 2017 Initial

Proposed Terms ⁵	Proposed Construction	Intrinsic Evidence	Preliminary Extrinsic Evidence
			<p>Determination at 116–121 (USITC filed Sept. 1, 2016)</p> <ul style="list-style-type: none"> • <i>In the Matter of Certain Memory Modules and Components Thereof, and Products Containing the Same</i>, Inv. No. 337-TA-1023, Jan. 16, 2018 Commission Review at 1–2 (USITC filed Sept. 1, 2016) • <i>In the Matter of Certain Memory Modules and Components Thereof</i>, Inv. No. 337-TA-1089, Nov. 22, 2019 Complainant Netlist, Inc.’s Omnibus Response to Respondents’ and Staff’s Petitions for Review at 29–33 (USITC filed Oct. 31, 2017) • <i>In the Matter of Certain Memory Modules and Components Thereof</i>, Inv. No. 337-TA-1089, Apr. 21, 2020 Commission Opinion at 7–13 (USITC filed Oct. 31, 2017) • Collins English Dictionary, Seventh Edition, at 16 (2005) • The New Oxford American Dictionary, Second Edition, at 15–16 (2005)

Proposed Terms ⁵	Proposed Construction	Intrinsic Evidence	Preliminary Extrinsic Evidence
			<ul style="list-style-type: none"> • Newton's Telecom Dictionary, 24th Edition, at 180–81, 263 (2008) • McGraw-Hill Dictionary of Scientific and Technical Terms, Sixth Edition, at 294 (2003) • Dictionary of Computing, Fifth Edition, at 92, 94 (2004) • Wiley Electrical and Electronics Engineering Dictionary, at 212, 256 (2004) • A Dictionary of Computing, Fifth Edition, at 179 (2004)
		<ul style="list-style-type: none"> • U.S. Patent No. 10,949,339 at Abstract; Figs. 1-6; 1:18-51, 1:52-2:4, 2:5-23, 2:26-61, 2:62-3:22, 3:23-28, 3:51-4-8, 4:15-47, 4:48-5:3, 5:4-22, 5:23-43, 5:44-64, 5:65-6:16, 6:17-41, 6:42-64, 6:65-7:14, 7:15-43, 7:44-8:53, 9:27-43, 10:54-11:44, 11:45-12:14, 13:31-53, 13:54-14:14, 14:15-33, 14:34-58, 14:59-15:25, 15:26-40, 15:41-60, 15:61-16:6, 16:7-25, 16:26-44, 16:45-64, 16:65-17:14, 17:15-44, 17:44-18:24, 18:25-65; claims 1-35 	<ul style="list-style-type: none"> • U.S. Patent No. 8,516,185, File History, 2012-06-21 Amendment and Request for Reconsideration after Non-Final Rejection at 7–9 • U.S. Patent No. 8,516,185, File History, 2012-09-13 Office Action at 4–5, 11–13 • U.S. Patent No. 8,516,185, File History, 2013-03-13 Amendment and Request for Reconsideration after Non-Final Rejection at 10–13

Proposed Terms ⁵	Proposed Construction	Intrinsic Evidence	Preliminary Extrinsic Evidence
		<ul style="list-style-type: none"> U.S. Patent No. 10,949,339 File History, 2017-03-27 Application, 2017-10-06 Non-Final Rejection, 2018-04-06 Amendment and Request for Reconsideration After Non-Final Rejection, 2018-07-27 Final Rejection, 2019-07-29 Amendment and Request for Continued Examination, 2019-10-03 Non-Final Rejection, 2020-03-25 Amendment and Request for Reconsideration After Non-Final Rejection, 2020-04-24 Final Rejection, 2020-06-24 Response After Final Action, 2020-07-14 After Final Consideration Program Decision, 2020-07-24 Amendment and Request for Continued Examination, 2020-07-29 Examiner Interview Summary Record, 2020-11-16 Notice of Allowance, 2020-12-17 Amendment After Notice of Allowance, 2021-01-21 Notice of Allowance and Response to Amendment U.S. Patent No. 9,606,907 at 2:25-3:20; claims 1-65 U.S. Patent No. 8,417,870 at Abstract; Figs. 1-5; 1:50-57, 2:19-3:8, 3:17-4:44, 4:58-64, 5:25-59, 	<ul style="list-style-type: none"> U.S. Patent No. 8,516,185, File History, 2013-07-11 Notice of Allowance at 2–4 U.S. Patent No. 8,417,870, File History, 2013-02-02 Notice of Allowance at 7–9 U.S. Patent No. 9,606,907, File History, 2015-11-23 Office Action at 5–6 U.S. Patent No. 9,606,907, File History, 2016-10-06 Office Action at 2–5, 7 U.S. Patent No. 9,606,907, File History, 2016-11-03 Amendment at 29–34 U.S. Patent No. 9,606,907, File History, 2017-02-23 Corrected Notice of Allowability at 2–3 IPR2014-01029, Paper 10 (POPR) at 4–6 IPR2014-01029, Paper 11 (Institution Decision) at 2–3 IPR2014-01369, Paper 11 (POPR) at 5–6, 19, 35–41 IPR2014-01369, Paper 12 (Institution Decision) at 2–4, 6–8

Proposed Terms ⁵	Proposed Construction	Intrinsic Evidence	Preliminary Extrinsic Evidence
		<p>6:39-7:19, 7:20-8:36, 8:37-9:4, 9:5-37, 9:38-57; claims 1-20</p> <ul style="list-style-type: none"> • U.S. Patent No. 7,289,386 at Abstract; Figs. 1-7; 3:17-30, 23:24-34, 24:57-26:19, 27:21-28:17, 30:47-32:50; claims 1-13 • U.S. Patent No. 7,532,537 at Abstract; Figs. 3A-11; 2:62-3:35, 4:55-5:2, 5:59-9:18, 13:4-14:36, 17:8-18:50, 33:51-61, 35:4-65, 38:25-40:26, claims 1-44 	<ul style="list-style-type: none"> • IPR2017-00577, Paper 6 (POPR) at 2–6, 9–11, 13–17, 18–47, 50–65 • IPR2017-00577, Paper 8 (Institution Decision) at 3–4, 9–10 • IPR2017-00577, Paper 26 (Final Written Decision) at 3–4, 14–16 • <i>Netlist, Inc. v. Smart Modular Techs., Inc.</i>, No. 4:13-cv-05889-YGR, Dkt. No. 253 at 11–12, 15–16 (N.D. Cal. Aug. 27, 2014) • <i>Netlist, Inc. v. SK Hynix Inc. et al.</i>, No. 8:16-cv-01605-JLS-JCG, Dkt. No. 117, Exhibit A at 8–14, 20–40 (C.D. Cal. May 19, 2017) • <i>Netlist, Inc. v. SK Hynix Inc. et al.</i>, No. 8:16-cv-01605-JLS-JCG, Dkt. No. 124 at 6–11 (C.D. Cal. May 26, 2017) • <i>Netlist, Inc. v. SK Hynix Inc. et al.</i>, No. 8:16-cv-01605-JLS-JCG, Dkt. No. 143 at 2–9 (C.D. Cal. June 30, 2017) • <i>In the Matter of Certain Memory Modules and Components Thereof, and Products Containing the Same</i>, Inv. No. 337-TA-1023, Nov. 14, 2017 Initial

Proposed Terms ⁵	Proposed Construction	Intrinsic Evidence	Preliminary Extrinsic Evidence
			<p>Determination at 116–121 (USITC filed Sept. 1, 2016)</p> <ul style="list-style-type: none"> • <i>In the Matter of Certain Memory Modules and Components Thereof, and Products Containing the Same</i>, Inv. No. 337-TA-1023, Jan. 16, 2018 Commission Review at 1–2 (USITC filed Sept. 1, 2016) • <i>In the Matter of Certain Memory Modules and Components Thereof</i>, Inv. No. 337-TA-1089, Nov. 22, 2019 Complainant Netlist, Inc.’s Omnibus Response to Respondents’ and Staff’s Petitions for Review at 29–33 (USITC filed Oct. 31, 2017) • <i>In the Matter of Certain Memory Modules and Components Thereof</i>, Inv. No. 337-TA-1089, Apr. 21, 2020 Commission Opinion at 7–13 (USITC filed Oct. 31, 2017) • Collins English Dictionary, Seventh Edition, at 16 (2005) • The New Oxford American Dictionary, Second Edition, at 15–16 (2005)

Proposed Terms ⁵	Proposed Construction	Intrinsic Evidence	Preliminary Extrinsic Evidence
			<ul style="list-style-type: none"> • Newton's Telecom Dictionary, 24th Edition, at 180–81, 263 (2008) • McGraw-Hill Dictionary of Scientific and Technical Terms, Sixth Edition, at 294 (2003) • Dictionary of Computing, Fifth Edition, at 92, 94 (2004) • Wiley Electrical and Electronics Engineering Dictionary, at 212, 256 (2004) • A Dictionary of Computing, Fifth Edition, at 179 (2004)

D. U.S. Patent Nos. 11,016,918 and 11,232,054

Proposed Terms ⁶	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
“a second plurality of address and control signals” (’918 patent, claims 1–3, 4–7, 9–13, 15, 21)	“a second plurality of address and control signals that are distinct from a first plurality of address and control signals”	<ul style="list-style-type: none"> • ’918 Patent at 4:45-51, 5:24-29, 7:5-11, 7:54-57, 9:8-13, 9:17-19, 12:3-23, 12:44-51, 13:29-56, 14:30-60, 14:61-15:9, 15:10-26, 15:27-49, 15:50-58, 16:12-32, 16:33-55, 16:56-17:13, 17:14-30, 17:59-18:17, 18:65-19:30, 21:14-22, 21:56-22:8, 23:28-40, 23:41- 	<ul style="list-style-type: none"> • IPR2017-00692, Paper 1 (Petition) at 57–68 • IPR2017-00692, Paper 25 (FWD) at 32–36 • IPR2014-00994, Paper 7 (POPR) at 29–30, 34 • IPR2014-00994, Paper 8 (Institution Decision) at 7, 8–9, 11

⁶ Listed claims also include all claims dependent thereon, even if those claims are not separately listed.

Proposed Terms ⁶	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
		<p>24:8, 24:35-59, 24:60-25:7, 25:8-31, 25:32-53, 26:36-65, 29:18-54, 32:58-33:13, Fig 8A, Fig. 8B, Fig. 10, Fig. 12, Fig. 13, Fig. 14, Fig. 15A, Fig. 15B, Fig. 15C, Claim 8</p> <ul style="list-style-type: none"> • 2012-07-26 Specification of Patent App. 13/559,476 at Claim 13, Claim 20 • U.S. Patent 8,874,831 at Claim 7 • Provisional Patent App. 61/512,871, Appendix A at 7 • U.S. Patent 8,880,791 at Claim 2, Claim 19 • 2013-05-29 Specification of Patent App. 13/905,053 at Claim 14, Claim 27 • U.S. Patent 8,677,060 at Claim 14, Claim 27 • 2016-01-19 Specification of Patent App. 15/000,834 at Claim 1 • 2014-09-17 Specification of Patent App. 14/489,332 at Claim 1 • U.S. Patent 8,904,099 at Claim 1, Claim 2, Claim 16, Claim 17, Claim 31, Claim 32 • 2013-05-29 Specification of Patent App. 13/905,048 at Claim 11, Claim 23, Claim 30 • U.S. Patent 8,671,243 at Claim 11, Claim 23, Claim 30 	<ul style="list-style-type: none"> • IPR2014-01370, Paper 8 (Petition) at 9–10 • IPR2014-01370, Paper 11 (POPR) at 41–43 • IPR2014-01370, Paper 13 (Institution Decision) at 2, 6, 9 • IPR2017-00649, Paper 1 (Petition) at 7 • IPR2017-00649, Paper 7 (Institution Decision) at 3 • IPR2022-00418, Paper 2 (Petition) at 7 • IPR2017-00730, Paper 1 (Petition) at 19–20 • IPR2017-00730, Paper 1 (Petition) at 28 • IPR2017-00730, Paper 6 (POPR) at 9–10 • IPR2022-00237, Paper 12 (POPR) at 29 • IPR2022-00996, Paper 1 (Petition) at 96 • 2011-10-18 Netlist Response to Office Action for Patent App. 12/240,916 at 14–15 • 2012-05-24 Netlist Response to Office Action for Patent App. 12/240,916 at 7–14

Proposed Terms ⁶	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
		Micron reserves the right to rely on intrinsic evidence cited by Netlist.	<ul style="list-style-type: none"> 2017-11-06 Netlist Response to Office Action for Patent App. 14/840,865 at 11–13 2020-03-12 Netlist Response to Office Action for Patent App. 15/934,416 at 9–11
“dual buck converter” / “dual-buck converter” (’918 patent, claims 2, 17, 28; ’054 patent, claim 15)	“buck converter with two outputs outputting two distinct regulated voltages”	<ul style="list-style-type: none"> ’918 Patent at 29:18-54, Fig 16 ’054 Patent at 29:18-54, Fig 16 <p>Micron reserves the right to rely on intrinsic evidence cited by Netlist.</p>	<ul style="list-style-type: none"> IPR2022-00996, Paper 1 (Petition) at 36–38
“pre-regulated input voltage” / “input voltage” (’918 patent, claims 16–22, 30)	Plain and ordinary meaning, where “a pre-regulated input voltage” is different from “an input voltage”	<ul style="list-style-type: none"> ’918 Patent at Abstract, 24:35-59, 26:36-65, 28:3-19, 28:26-38, 28:39-58, 28:59-29:17, 29:18-54, 29:65-30:14, 30:15-25, Fig 16 <p>Micron reserves the right to rely on intrinsic evidence cited by Netlist.</p>	<ul style="list-style-type: none"> IPR2022-00996, Paper 1 (Petition) at 73-75 IPR2022-00996, Paper 7 (POPR) IPR2022-00996, Paper 10 (Institution Decision) IPR2022-00996, Paper 21 (POR) at 38, 69-71 IPR2022-00999, Paper 1 (Petition) IPR2022-00999, Paper 11 (Institution Decision) IPR2022-00999, Paper 22 (POR)
“first” / “second” / “third” / “fourth” “regulated voltages”	“first regulated voltage that is distinct from the second, third, and fourth regulated voltages” / “second regulated voltage that is	<ul style="list-style-type: none"> ’918 Patent at Abstract, 22:53-67, 23:41-24:8, 24:35-59, 25:8-31, 26:4-25, 26:36-65, 27:59-28:2, 28:3-19, 28:26-38, 28:59-29:17, 29:18-54, 29:65-30:14, 30:15-25, 	<ul style="list-style-type: none"> IPR2017-00692, Paper 1 (Petition) at 57–68 IPR2017-00692, Paper 25 (FWD) at 32–36

Proposed Terms ⁶	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
('918 patent, all asserted claims)	distinct from the first, third, and fourth regulated voltages” / “third regulated voltage that is distinct from the first, second, and fourth regulated voltages” / “fourth regulated voltage that is distinct from the first, second, and third regulated voltages”	<p>30:35-49, Fig. 12, Fig 13, Fig. 14, Fig. 15A, Fig. 15B, Fig. 15C, Fig. 16, Fig 17, Claim 4, Claim 8, Claim 14</p> <ul style="list-style-type: none"> • 2021-03-02 Office Action for Patent App. 17/138,766 at 3 • 2021-03-11 Netlist Response to Office Action for Patent App. 17/138,766 at 2-11 • 2021-11-19 Netlist Response to Office Action for Patent App. 17/328,019 at 2-12 • 2008-06-02 Specification of Patent App. 12/131,873 at Claim 21, Claim 28, Claim 34, Claim 36 <p>Micron reserves the right to rely on intrinsic evidence cited by Netlist.</p>	<ul style="list-style-type: none"> • IPR2014-00994, Paper 7 (POPR) at 29–30, 34 • IPR2014-00994, Paper 8 (Institution Decision) at 7, 8–9, 11 • IPR2014-01370, Paper 8 (Petition) at 9–10 • IPR2014-01370, Paper 11 (POPR) at 41–43 • IPR2014-01370, Paper 13 (Institution Decision) at 2, 6, 9 • IPR2017-00649, Paper 1 (Petition) at 7 • IPR2017-00649, Paper 7 (Institution Decision) at 3 • IPR2022-00418, Paper 2 (Petition) at 7 • 2011-10-18 Netlist Response to Office Action for Patent App. 12/240,916 at 14–15 • 2012-05-24 Netlist Response to Office Action for Patent App. 12/240,916 at 7–14 • 2017-11-06 Netlist Response to Office Action for Patent App. 14/840,865 at 11–13 • 2020-03-12 Netlist Response to Office Action for Patent App. 15/934,416 at 9–11

Proposed Terms ⁶	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
<p>“first” / “second” / “third” / “fourth” “regulated voltage amplitude”</p> <p>(’918 patent, all asserted claims)</p>	<p>“first voltage amplitude that is distinct from the second, third, and fourth voltage amplitudes” / “second voltage amplitude that is distinct from the first, third, and fourth voltage amplitudes” / “third voltage amplitude that is distinct from the first, second, and fourth voltage amplitude” / “fourth voltage amplitude that is distinct from the first, second, and third voltage amplitude”</p>	<ul style="list-style-type: none"> • ’918 Patent at Abstract, 22:53-67, 23:41-24:8, 24:35-59, 25:8-31, 26:4-25, 26:36-65, 27:59-28:2, 28:3-19, 28:26-38, 28:59-29:17, 29:18-54, 29:65-30:14, 30:15-25, 30:35-49, Fig. 12, Fig 13, Fig. 14, Fig. 15A, Fig. 15B, Fig. 15C, Fig. 16, Fig 17, Claim 4, Claim 8, Claim 14 • 2021-03-02 Office Action for Patent App. 17/138,766 at 3 • 2021-03-11 Netlist Response to Office Action for Patent App. 17/138,766 at 2-11 • 2021-11-19 Netlist Response to Office Action for Patent App. 17/328,019 at 2-12 • 2008-06-02 Specification of Patent App. 12/131,873 at Claim 21, Claim 28, Claim 34, Claim 36 <p>Micron reserves the right to rely on intrinsic evidence cited by Netlist.</p>	<ul style="list-style-type: none"> • IPR2017-00692, Paper 1 (Petition) at 57–68 • IPR2017-00692, Paper 25 (FWD) at 32–36 • IPR2014-00994, Paper 7 (POPR) at 29–30, 34 • IPR2014-00994, Paper 8 (Institution Decision) at 7, 8–9, 11 • IPR2014-01370, Paper 8 (Petition) at 9–10 • IPR2014-01370, Paper 11 (POPR) at 41–43 • IPR2014-01370, Paper 13 (Institution Decision) at 2, 6, 9 • IPR2017-00649, Paper 1 (Petition) at 7 • IPR2017-00649, Paper 7 (Institution Decision) at 3 • IPR2022-00418, Paper 2 (Petition) at 7 • 2011-10-18 Netlist Response to Office Action for Patent App. 12/240,916 at 14–15 • 2012-05-24 Netlist Response to Office Action for Patent App. 12/240,916 at 7–14 • 2017-11-06 Netlist Response to Office Action for Patent App. 14/840,865 at 11–13

Proposed Terms ⁶	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
			<ul style="list-style-type: none"> 2020-03-12 Netlist Response to Office Action for Patent App. 15/934,416 at 9–11
<p>“at least three regulated voltages” (’054 patent, claims 1–15)</p>	<p>“at least three distinct regulated voltages”</p>	<ul style="list-style-type: none"> ’054 Patent at Abstract, 22:53-67, 23:41-24:8, 24:35-59, 24:60-25:7, 25:8-31, 25:54-26:3, 26:4-25, 26:36-65, 27:59-28:2, 28:3-19, 28:26-38, 28:39-58, 28:59-29:17, 29:18-54, 29:65-30:14, 30:15-25, 30:35-49, Fig. 12, Fig. 13, Fig. 14, Fig. 15A, Fig. 15B, Fig. 15C, Fig. 16, Fig. 17, Claim 18, Claim 19, Claim 20, Claim 21, Claim 26, Claim 27, Claim 28 2021-03-02 Office Action for Patent App. 17/138,766 at 3 2021-11-19 Netlist Response to Office Action for Patent App. 17/328,019 at 2-12 2008-06-02 Specification of Patent App. 12/131,873 at Claim 21, Claim 28, Claim 34, Claim 36 <p>Micron reserves the right to rely on intrinsic evidence cited by Netlist.</p>	<ul style="list-style-type: none"> IPR2017-00692, Paper 1 (Petition) at 57–68 IPR2017-00692, Paper 25 (FWD) at 32–36 IPR2014-00994, Paper 7 (POPR) at 29–30, 34 IPR2014-00994, Paper 8 (Institution Decision) at 7, 8–9, 11 IPR2014-01370, Paper 8 (Petition) at 9–10 IPR2014-01370, Paper 11 (POPR) at 41–43 IPR2014-01370, Paper 13 (Institution Decision) at 2, 6, 9 IPR2017-00649, Paper 1 (Petition) at 7 IPR2017-00649, Paper 7 (Institution Decision) at 3 IPR2022-00418, Paper 2 (Petition) at 7 2011-10-18 Netlist Response to Office Action for Patent App. 12/240,916 at 14–15 2012-05-24 Netlist Response to Office Action for Patent App. 12/240,916 at 7–14

Proposed Terms ⁶	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
			<ul style="list-style-type: none"> • 2017-11-06 Netlist Response to Office Action for Patent App. 14/840,865 at 11–13 • 2020-03-12 Netlist Response to Office Action for Patent App. 15/934,416 at 9–11
<p>“plurality of regulated voltages” (’054 patent, claims 16, 24)</p>	<p>“plurality of distinct regulated voltages”</p>	<ul style="list-style-type: none"> • ’054 Patent at Abstract, 22:53-67, 23:41-24:8, 24:35-59, 24:60-25:7, 25:8-31, 25:54-26:3, 26:4-25, 26:36-65, 27:59-28:2, 28:3-19, 28:26-38, 28:39-58, 28:59-29:17, 29:18-54, 29:65- 30:14, 30:15-25, 30:35-49, Fig. 12, Fig 13, Fig. 14, Fig. 15A, Fig. 15B, Fig. 15C, Fig. 16, Fig 17, Claim 18, Claim 19, Claim 20, Claim 21, Claim 26, Claim 27, Claim 28 • 2021-03-02 Office Action for Patent App. 17/138,766 at 3 • 2021-11-19 Netlist Response to Office Action for Patent App. 17/328,019 at 2-12 • 2008-06-02 Specification of Patent App. 12/131,873 at Claim 21, Claim 28, Claim 34, Claim 36 <p>Micron reserves the right to rely on intrinsic evidence cited by Netlist.</p>	<ul style="list-style-type: none"> • IPR2017-00692, Paper 1 (Petition) at 57–68 • IPR2017-00692, Paper 25 (FWD) at 32–36 • IPR2014-00994, Paper 7 (POPR) at 29–30, 34 • IPR2014-00994, Paper 8 (Institution Decision) at 7, 8–9, 11 • IPR2014-01370, Paper 8 (Petition) at 9–10 • IPR2014-01370, Paper 11 (POPR) at 41–43 • IPR2014-01370, Paper 13 (Institution Decision) at 2, 6, 9 • IPR2017-00649, Paper 1 (Petition) at 7 • IPR2017-00649, Paper 7 (Institution Decision) at 3 • IPR2022-00418, Paper 2 (Petition) at 7 • 2011-10-18 Netlist Response to Office Action for Patent App. 12/240,916 at 14–15

Proposed Terms ⁶	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
			<ul style="list-style-type: none"> • 2012-05-24 Netlist Response to Office Action for Patent App. 12/240,916 at 7–14 • 2017-11-06 Netlist Response to Office Action for Patent App. 14/840,865 at 11–13 • 2020-03-12 Netlist Response to Office Action for Patent App. 15/934,416 at 9–11
<p>“A memory module”</p> <p>(’918 patent, all asserted claims; ’054 patent, all asserted claims)</p>	<p>The preamble is non-limiting.</p>	<ul style="list-style-type: none"> • ’918 Patent at Title, Abstract, 2:34-55, 3:46-52, 3:66-7:67, 12:52-63, 12:64-13:25, 21:14-23, 21:24-55, 22:53-67, 23:1-40, Fig. 5A, Fig. 5B, Fig. 12, Fig. 13, Fig. 14 • ’054 Patent at Title, Abstract, 2:34-55, 3:46-52, 3:66-7:67, 12:52-63, 12:64-13:25, 21:14-23, 21:24-55, 22:53-67, 23:1-40, Fig. 5A, Fig. 5B, Fig. 12, Fig. 13, Fig. 14 <p>Micron reserves the right to rely on intrinsic evidence cited by Netlist.</p>	<ul style="list-style-type: none"> • IPR2017-00692, Paper 1 (Petition) at 20, 49, 66 • IPR2017-00692, Paper 6 (POPR) at 20-21 • IPR2017-00692, Paper 7 (Institution Decision) at 10 • IPR2017-00692, Paper 12 (POR) at 1-3, 13-41, 43-45 • IPR2017-00692, Paper 15 (Pet Reply) at 1-19 • IPR2017-00692, Paper 25 (FWD) at 9-14, 21, 25-26, 30 • IPR2022-00996, Paper 1 (Petition) at 19 • IPR2022-00996, Paper 7 (POPR) • IPR2022-00996, Paper 10 (Institution Decision) • IPR2022-00996, Paper 21 (POR) at 1-3, 44-59

Proposed Terms ⁶	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
			<ul style="list-style-type: none"> • IPR2022-00999, Paper 1 (Petition) at 19 • IPR2022-00999, Paper 7 (POPR) • IPR2022-00999, Paper 11 (Institution Decision) • IPR2022-00999, Paper 22 (POR) at 2-14, 47-63
<p>“converter circuit” (’918 patent, all asserted claims)</p>	<p>The “converter circuit” feature is subject to § 112, ¶ 6, with the corresponding functionality being the functions of:</p> <p>(i) “provid[ing] a fourth regulated voltage having a fourth voltage amplitude”;</p> <p>(ii) “reduc[ing] the pre-regulated input voltage to provide a fourth regulated voltage”;</p> <p>(iii) “provid[ing] the fourth regulated voltage”; and</p> <p>(iv) “reduc[ing] the pre-regulated voltage input to provide the fourth regulated voltage”.</p>	<ul style="list-style-type: none"> • ’918 Patent at 29:18–64 <p>Micron reserves the right to rely on intrinsic evidence cited by Netlist.</p>	<ul style="list-style-type: none"> • IPR2022-00996, Paper 1 (Petition) • IPR2022-00996, Paper 7 (POPR) • IPR2022-00996, Paper 10 (Institution Decision) • IPR2022-00996, Paper 21 (POR) at 27-33, 60-69 • IPR2022-00999, Paper 1 (Petition) • IPR2022-00999, Paper 7 (POPR) • IPR2022-00999, Paper 11 (Institution Decision) • IPR2022-00999, Paper 22 (POR) at 30-36, 63-72 • Declaration of Dr. Stone explaining the technology, state of the art at the time the applications leading to the ’054 and ’918 patents were filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including

Proposed Terms ⁶	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
	<p>The corresponding structure that is “configured to” perform the recited functions is a “converter circuit,” as described in the ’918 patent at 29:18–64.</p>		<p>whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p>
<p>“at least one circuit” (’918 patent, claims 1–3, 5–7, 9–13, 15, 21)</p>	<p>The “at least one circuit” feature is subject to § 112, ¶ 6, with the corresponding functionality being the functions of:</p> <p>(i) “receiv[ing] a first plurality of address and control signals via the first portion of the plurality of edge connections”;</p> <p>(ii) “output[ting] a second plurality of address and control signals to the plurality of SDRAM devices”;</p> <p>(iii) “receiv[ing] a first plurality of address and control signals via a second portion of the plurality of edge connections”; and</p>	<ul style="list-style-type: none"> • ’918 Patent at 21:14–26:65, 29:33–54 <p>Micron reserves the right to rely on intrinsic evidence cited by Netlist.</p>	<ul style="list-style-type: none"> • IPR2022-00996, Paper 1 (Petition) • IPR2022-00996, Paper 7 (POPR) • IPR2022-00996, Paper 10 (Institution Decision) • IPR2022-00996, Paper 21 (POR) • IPR2022-00999, Paper 1 (Petition) • IPR2022-00999, Paper 7 (POPR) • IPR2022-00999, Paper 11 (Institution Decision) • IPR2022-00999, Paper 22 (POR) • Declaration of Dr. Stone explaining the technology, state of the art at the time the applications leading to the ’054 and ’918 patents were filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the

Proposed Terms ⁶	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
	<p>(iv) “output a second plurality of address and control signals to the plurality of SDRAM devices”.</p> <p>The corresponding structure that is “operable to” perform the recited functions is a “circuit that is different from a memory module controller,” as described in the ’918 patent at 21:14–26:65, 29:33–54.</p>		<p>boundaries of this claim element with reasonable certainty.</p>
<p>“first circuit” (’054 patent, claims 1–13, 15)</p>	<p>“a circuit that is different from a memory module controller”</p>	<ul style="list-style-type: none"> • ’054 Patent at 21:14–26:65, 29:33–54 <p>Micron reserves the right to rely on intrinsic evidence cited by Netlist.</p>	<ul style="list-style-type: none"> • IPR2022-00996, Paper 1 (Petition) • IPR2022-00996, Paper 7 (POPR) • IPR2022-00996, Paper 10 (Institution Decision) • IPR2022-00996, Paper 21 (POR) • IPR2022-00999, Paper 1 (Petition) • IPR2022-00999, Paper 7 (POPR) • IPR2022-00999, Paper 11 (Institution Decision) • IPR2022-00999, Paper 22 (POR)
<p>“controller” (’918 patent, claims 12, 18–19, 25–26;</p>	<p><u>’918 Patent</u></p> <p>The “controller” feature is subject to § 112, ¶ 6, with</p>	<ul style="list-style-type: none"> • ’918 patent at 21:14–26:65, 29:33–54 • ’054 patent at 21:14–26:65, 29:33–54 	<ul style="list-style-type: none"> • IPR2014-00994, Paper 7 (POPR) • IPR2014-00994, Paper 8 (Institution Decision) • IPR2014-01370, Paper 8 (Petition)

Proposed Terms ⁶	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
<p>'054 patent, claims 5, 7–13, 16–17, 23–25, 29–30)</p>	<p>the corresponding functionality being the functions of:</p> <p>(i) “receiv[ing] the trigger signal, wherein, in response to the trigger signal, the controller performs a write operation to the non-volatile memory”;</p> <p>(ii) “receiv[ing] the signal, wherein the controller executes a write operation in response to the signal”; and</p> <p>(iii) “receiv[ing] the signal, wherein, in response to the signal, the controller executes a write operation”.</p> <p>The corresponding structure that is “configured to” perform the recited functions is a “controller that is different from the at least one circuit and the voltage monitor circuit and the one or more</p>	<p>Micron reserves the right to rely on intrinsic evidence cited by Netlist.</p>	<ul style="list-style-type: none"> • IPR2014-01370, Paper 11 (POPR) • IPR2014-01370, Paper 13 (Institution Decision) • IPR2017-00649, Paper 1 (Petition) • IPR2017-00649, Paper 7 (Institution Decision) • IPR2022-00418, Paper 2 (Petition) • IPR2017-00692, Paper 1 (Petition) • IPR2017-00692, Paper 6 (POPR) • IPR2017-00692, Paper 7 (Institution Decision) • IPR2017-00692, Paper 12 (POR) • IPR2017-00692, Paper 15 (Pet Reply) • IPR2017-00692, Paper 25 (FWD) • IPR2022-00996, Paper 1 (Petition) • IPR2022-00996, Paper 7 (POPR) • IPR2022-00996, Paper 10 (Institution Decision) • IPR2022-00996, Paper 21 (POR) • IPR2022-00999, Paper 1 (Petition) • IPR2022-00999, Paper 7 (POPR) • IPR2022-00999, Paper 11 (Institution Decision) • IPR2022-00999, Paper 22 (POR) at 46-47, 74-75 • Declaration of Dr. Stone explaining the technology, state of the art at the time the applications

Proposed Terms ⁶	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
	<p>registers,” as described in the ’918 patent at 21:14–26:65, 29:33–54.</p> <p><u>’054 Patent</u></p> <p>The “controller” feature is subject to § 112, ¶ 6, with the corresponding functionality being the functions of:</p> <p>(i) “perform[ing] one or more operations including a write operation to transfer data to non-volatile memory” “in response to the trigger signal”; and</p> <p>(ii) “perform[ing] one or more operations in response to the voltage monitor circuit detecting an amplitude change in the input voltage, and wherein the one or more operations include a write operation to transfer data into non-volatile memory”.</p>		<p>leading to the ’054 and ’918 patents were filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p>

Proposed Terms ⁶	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
	The corresponding structure that is “configured to” perform the recited functions is a “controller that is different from the first circuit and the voltage monitor circuit,” as described in the ’054 patent at 21:14–26:65, 29:33–54.		
“first operable state” (’054 patent, claims 4-7, 11-12, 16-17, 23, and 25)	“state in which a controller and a non-volatile memory subsystem are operatively decoupled (e.g., isolated) from a volatile memory subsystem by at least one circuit”; or in the alternative, indefinite.	<ul style="list-style-type: none"> • ’054 patent at 24:60-27:13, 30:50-64 <p>Micron reserves the right to rely on intrinsic evidence cited by Netlist.</p>	<ul style="list-style-type: none"> • IPR2022-00999, Paper 22 (POR) at 72-75
“second operable state” (’054 patent, claims 4-7, 11-12, 16-17, 23, and 25)	“state in which the volatile memory subsystem is operatively coupled to the controller to allow data to be communicated between the volatile memory subsystem and the nonvolatile memory subsystem via the	<ul style="list-style-type: none"> • ’054 patent at 24:60-27:13, 30:50-64 <p>Micron reserves the right to rely on intrinsic evidence cited by Netlist.</p>	<ul style="list-style-type: none"> • IPR2022-00999, Paper 22 (POR) at 72-75

Proposed Terms ⁶	Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
	controller”; or in the alternative, indefinite.		